

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the matter of)	
)	
Amendment of Part 15) regarding new)	ET Docket No. 04-37
requirments and measurement guidelines for)	
Access Broadband over Power Line Systems)	
)	

**COMMENTS OF THE
HILL COUNTRY AMATEUR RADIO CLUB**

I INTRODUCTION

1. The Hill Country Amateur Radio Club (hereinafter referred to as "HCARC"), pursuant to Sections 1.415 and 1.419 of the Commission's Rules and Regulations, respectfully submits these comments in response to the Commission's Notice of Proposed Rule Making, ET Docket No. 04-37, released February 23, 2004.

II PRELIMINARY STATEMENT

2. HCARC is club of approximately sixty licensed radio amateurs residing in the Texas Hill Country. We hold regular monthly meetings at the Kerrville, TX Red Cross building. The Club is active in emergency communications in the area, including work with the Red Cross and other local organizations. We hold regularly scheduled amateur license testing. HCARC also maintains a repeater station on the 2 Meter band under our club call, N5HR.

III BACKGROUND

3. HCARC notes that thousands of licensed radio amateurs filled comments on the Notice of Inquiry (NOI) which the Commission issued in 2003. Some of these comments specifically cited the likelihood of harmonics being generated by BPL systems, and stated that this, could represent a potential source of interference to amateurs as well as other services.

IV DISCUSSION

4. HCARC observes that the word, "harmonics" doesn't ever appear in the Docket.. How can the FCC, which we always thought was trying to protect the radio spectrum from interference, have ignored comments regarding the possibility of BPL harmonics, when it is common knowledge that all radio transmitters produce harmonic to some extent?

5. It is these harmonics which will radiate even better from the power lines carrying BPL signals than will fundamental BPL frequencies. Fundamental BPL frequencies have been shown by ARRL

testing to be a major source of interference to amateurs operating in the HF bands. But, harmonics also pose a threat to amateurs involved in VHF and UHF activities, including those using repeaters. Due to our hilly terrain, there are many places in the immediate area where the signal from our repeater is quite weak. The existence of BPL in our area may well reduce the effectiveness of our repeater still further. Those amateurs engaged in so-called weak signal operation at VHF and UHF may also experience a reduction of their station capability as a result of interference from BPL harmonics. The same may be true of other VHF and UHF users including government, particularly aircraft, police, fire and other emergency services.

6. The Docket states that BPL systems might "notch out" HF amateur bands. But this will not help eliminate interference from harmonics.

7. HCARC believes that extensive testing of the effects of BPL on other radio services, including its harmonics, must be made by those proposing BPL, before any new rules for operation of such systems are put into effect and systems allowed to operate. It should be the responsibility of those proposing BPL to pay for this testing, but the tests should be observed by the government, or some other independent agency.

8. Some, proposing BPL, claim that their devices can "listen", then not use frequencies being used at that time. HCARC, notes that, in addition to not being effective at harmonic frequencies, such a technique does not help when the amateur, or any other radio user, is listening to, or monitoring, a frequency. Are amateurs supposed to transmit every so often to keep a frequency clear of BPL QRM? This would seem crazy

IV CONCLUSION AND RECOMMENDATIONS

9. For the reasons given in these comments, HCARC urges the Commission not proceed with BPL. The potential for damage to Amateur Radio, and possibly other services, is too great. Furthermore, existing BPL systems should be shut down.

RESPECTFULLY SUBMITTED,

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